

EXHIBIT G

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

-----x	:	
FARHAD AZIMA,	:	
	:	
Plaintiff,	:	
	:	Case No.
vs.	:	
	:	1:20-cv-954-
NICHOLAS DEL ROSSO and	:	UA-JLW
VITAL MANAGEMENT SERVICES,	:	
	:	
Defendants.	:	
-----x		

Washington, D.C.

Thursday, May 9, 2024

VIDEOTAPED Deposition of:

RAY ADAMS,

the witness, was called for examination by counsel for the Defendants, pursuant to notice, commencing at 9:11 a.m., at the law offices of Nelson Mullins Riley & Scarborough, LLP, 101 Constitution Avenue, NW, Washington, D.C., before Dawn A. Jaques, CSR, CLR, and Notary Public in and for the District of Columbia.

DIGITAL EVIDENCE GROUP
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1 of the Plaintiff.

2 MS. BROOKS: Laura Brooks on behalf
3 of Ray Adams.

4 MR. MAHFOOD: George Mahfood,
5 Sam Rosenthal, Justin Kaplan, all of
6 Nelson Mullins, on behalf of Defendants.

7 THE REPORTER: Mr. Adams, if you'll
8 raise your right hand to be sworn,
9 please.

10 (The witness was administered the oath.)

11 Whereupon,

12 RAY ADAMS,
13 was called as a witness, after having
14 been first duly sworn by the Notary
15 Public, was examined and testified as
16 follows:

17 EXAMINATION BY COUNSEL FOR THE DEFENDANTS

18 BY MR. MAHFOOD:

19 Q Good morning, Mr. Adams.

20 A Good morning.

21 Q Good to see you again.

22 I won't go into a long speech about

1 A I am.

2 Q And did you have a role in that
3 company?

4 A I was the CFO.

5 Q Was that a subsidiary of
6 ALG Transportation?

7 A I'd have to remember, but I believe
8 it was.

9 Q All right. I don't you know if we
10 asked you this before. Who are the
11 shareholders of ALG Transportation, Inc.?

12 A Farhad Azima is the sole
13 shareholder.

14 Q Are you familiar with Caucas
15 International LLC?

16 A I am.

17 Q What is your role in that, if any?

18 A I have no role in that.

19 Q Okay. Do you know who the members
20 of Caucas International, LLC, are?

21 A There are no members now because
22 it's not in existence.

1 Q Do you know when it ceased -- ceased
2 to be in existence?

3 A I believe it filed its final tax
4 return in 2018 or 2019. I'm not sure.

5 Q All right. Do you know what
6 business Caucas International was in when it
7 was in business?

8 A It was a logistics company.

9 Q By "logistics," do you mean it
10 was -- it was in trucking and shipment and
11 cargo handling?

12 A It was in trucking specifically.

13 Q All right. Did it have --
14 strike that.

15 Where were its operations, if you
16 know?

17 A Its operations were in Afghanistan.

18 Q Do you know what period of time it
19 in operated in Afghanistan?

20 A Again, I wasn't intimately involved
21 with that company, but it was during the
22 Afghan War.

1 A Yes.

2 Q Are you familiar with a company
3 AZRA LLC doing business as AeroTech Services?

4 A I am.

5 Q Did it ever come into existence?

6 MR. BEHRE: Objection as to
7 relevance and to time period, temporal
8 scope.

9 MR. MAHFOOD: You may answer the
10 question.

11 THE WITNESS: AZRA was an active
12 company, yes.

13 BY MR. MAHFOOD:

14 Q During what period of time was it
15 active?

16 A Same time frame, 2010-2020.

17 Q Do you know the members of AZRA LLC?

18 A I recall some of them. I don't
19 recall all of them.

20 Q Could you tell us who you recall?

21 A I recall Bob Rau and his family
22 trust; Farhad Azima; and there were two

1 minority shareholders, and I can't remember
2 the name of their companies.

3 Q Okay. Did you hold any position
4 with AZRA LLC?

5 A I was its CFO.

6 Q All right. Are you familiar with a
7 company called Georgian LLC?

8 A I am.

9 Q Did you hold a position with
10 Georgian?

11 A I can't recall on that one.

12 Q Do you know if Georgian LLC is --
13 strike that. Let me back up a moment.

14 Is AeroTech Services still in
15 operation?

16 A No.

17 Q Do you know when it ceased
18 operations?

19 A It ceased operations when Bob Rau
20 passed away.

21 Q About when?

22 A I believe its final tax return was

1 A He was one of them.

2 Q All right. HeavyLift International
3 Airlines, you're familiar with that, of
4 course?

5 A Yes.

6 Q All right. What was your role at
7 HeavyLift International Airlines?

8 A I was its group CFO.

9 Q All right. Was HeavyLift a
10 corporation?

11 A Define "a corporation."

12 Q I'm going to say a corporation is a
13 legal entity with shareholders.

14 MR. BEHRE: Objection, vague,
15 ambiguous.

16 MR. MAHFOOD: You may answer the
17 question.

18 THE WITNESS: By that definition, it
19 was a corporation.

20 BY MR. MAHFOOD:

21 Q All right. During what years did
22 HeavyLift International Airlines operate?

1 A It was formed in 2005 or 2006, and
2 operated actively through 2012.

3 Q What operations did HeavyLift
4 International Airlines have for those 2005 to
5 2012 years?

6 A HeavyLift had a contract to fly mail
7 for the US government from Bahrain to both
8 Iraq and Afghanistan.

9 Q Did it have any other operations?

10 A It did.

11 Q What were the other operations?

12 A I believe I'm covered under a
13 confidentiality agreement on the other
14 operations.

15 Q Well, you may be, but I'm still
16 going to ask you to tell me what other
17 operations HeavyLift International Airlines
18 was involved in.

19 A I'm going to -- may I consult with
20 my attorney?

21 MR. MAHFOOD: Yes, of course.

22 MS. BROOKS: Do I need to answer

1 that question?

2 MR. BEHRE: Do you want to take a
3 break?

4 MS. BROOKS: Yeah, we'll take a
5 break.

6 MR. MAHFOOD: Yeah, sure. Let's go
7 off the record.

8 THE VIDEOGRAPHER: The time is
9 9:26 a.m. We're now off the record.

10 (A break was taken.)

11 THE VIDEOGRAPHER: The time is
12 9:31 a.m. We are now on the record.

13 MS. BROOKS: Mr. Mahfood, would you
14 repeat your question?

15 BY MR. MAHFOOD:

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21 Q Are you able to tell us out of what
22 cities they operated?

1 A That's -- that's what I can tell
2 you.

3 Q That's what you can tell me. 737 --

4 A 300s.

5 Q 300s. Did HeavyLift own two DC-8s?

6 A I believe they owned three, but --

7 Q Three.

8 A -- one of them may have been leased.
9 I can't remember.

10 Q I think the documents show one was
11 leased --

12 A Yeah.

13 Q -- but let's say they operated three
14 DC-8s.

15 How long did HeavyLift operate the
16 737s?

17 A I don't recall the term of the
18 contract, but it would have been from
19 HeavyLift's inception to 2010 probably.

20 Q All right. What happened to those
21 737s?

22 A They were leased. They were

1 returned.

2 Q They were leased and returned?

3 A Yeah.

4 Q Okay. Sorry, I interrupted you.

5 And the two or three DC-8s, how long
6 did HeavyLift operate those?

7 A Throughout its inception. I mean,
8 while it owned it, it had its certificate, it
9 had DC-8s.

10 Q So from 2005 to 2012?

11 A Correct.

12 Q And it stopped operations in 2012?

13 A That's correct.

14 Q I didn't ask you about Caucas
15 Trading FZC. Are you familiar with that
16 company?

17 A I am.

18 Q And how are you familiar with that
19 company?

20 A That was the predecessor to Caucas
21 International.

22 Q Okay. What is the significance of

1 A At one point, it had five locations.

2 Q Okay. How many locations does it
3 have now?

4 A Three.

5 Q We'll get to that later.

6 Are you familiar with Shollar
7 Bottling?

8 A I am.

9 Q How are you familiar with Shollar
10 Bottling?

11 A I was its CFO.

12 Q When did Shollar Bottling have
13 operations?

14 A I don't recall.

15 Q Did Shollar Bottling cease
16 operations in or about 2012?

17 A It would have been sometime in that
18 time frame.

19 Q Was Mr. Azima a shareholder or
20 member of Shollar Bottling?

21 A He was.

22 Q Do you remember what portion of it

1 A New York General Trading Company was
2 considering an investment in HeavyLift.

3 Q Did they make the investment?

4 A They did not.

5 Q When were they considering the
6 investment?

7 A Hmm?

8 Q When were they considering the
9 investment in HeavyLift?

10 A 2011.

11 Q Did this information in Exhibit 1 --
12 did you present this Exhibit 1 financial
13 forecast?

14 A I may have.

15 Q And there was no confidentiality
16 requirement when you did so, was there?

17 MR. BEHRE: Objection, foundation,
18 calls for speculation.

19 MR. MAHFOOD: You may answer the
20 question.

21 THE WITNESS: The forecast itself is
22 marked confidential.

1 BY MR. MAHFOOD:

2 Q There's nothing in this forecast
3 that says to the recipient that you are not --
4 you are not permitted to share this with
5 anyone, is there?

6 MS. BROOKS: Mr. Mahfood --

7 THE WITNESS: Nothing in the
8 forecast.

9 BY MR. MAHFOOD:

10 Q Okay. And are you aware of any
11 non-disclosure agreement that HeavyLift had
12 with New York General Trading Company?

13 A I believe there was a Stock Purchase
14 Agreement that would have had a
15 confidentiality clause.

16 Q But that Stock Purchase Agreement
17 was never executed, was it?

18 A I don't recall, but it would --

19 Q I may have misunderstood your
20 previous answer.

21 Did New York General Trading Company
22 actually acquire shares of HeavyLift?

1 Q I get that. So there's no
2 confidential information in this document that
3 you're aware of? When I say "document," this
4 attached contract.

5 MS. BROOKS: Objection, misstates
6 the record.

7 MR. MAHFOOD: You may answer.

8 THE WITNESS: Well, it's all part of
9 a proposal, and the proposal was
10 confidential.

11 BY MR. MAHFOOD:

12 Q Where does it say in the proposal
13 that it's confidential and may not be
14 disclosed?

15 A It was understood to be
16 confidential.

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1 MS. BROOKS: Objection, calls --

2 THE WITNESS: Well, I totally
3 disagree with you.

4 BY MR. MAHFOOD:

5 Q And what did you do to require that
6 the people who received your quotes would not
7 disclose those prices to others?

8 A I've answered that question.

9 Q I haven't heard it.
10 What did you do to require that
11 people who received your quotes, but didn't
12 accept your contract, not disclose the
13 information in your quote to others?

14 A We would have expected them to keep
15 our information confidential.

16 Q Your expectations aren't actions
17 though, are they?

18 A Nobody else tried to steal our data.

19 Q That's not the question I asked you.
20 Your expectations were not actions,
21 were they?

22 MR. HERBERT: Objection.

1 knowledge of that, correct? Correct?

2 A Personal knowledge.

3 Q That's correct. Do you have
4 personal knowledge?

5 A No.

6 Q What you've testified to about when
7 they were put there was given to you by your
8 forensic expert, so it's secondhand, correct?

9 A If you want to take it that way.

10 MR. MAHFOOD: That's all I have.

11 Wait a minute. Do I have time?

12 MR. BEHRE: 33 seconds.

13 BY MR. MAHFOOD:

14 Q Mr. Azima relinquished his stock in
15 Smokehouse in 2013, correct?

16 A He did.

17 Q So what's his interest after 2013?

18 A The same. It's through his wife.

19 Q Oh, he doesn't own the stock in
20 Smokehouse, his wife does?

21 A Now she does.

22 Q As of 2013, correct?